

REMARKS

Applicants, their principal representatives in Germany, and the undersigned have carefully reviewed the first Office Action of February 19, 2008 in the subject U.S. patent application, together with the prior art cited and relied on by the Examiner in the rejections of the claims. In response, the Substitute Specification and claims of the subject U.S. patent application have been amended. It is believed that the claims now pending in the subject application are patentable over the prior art cited and relied on by the Examiner, taken either singly or in combination. Reexamination and reconsideration of the application, and allowance of the claims, is respectfully requested.

The underlying principle of the present invention, as set forth in the Substitute Specification and as recited in the claims, is to provide printing presses that provide for greater flexibility in construction and installation, while requiring fewer structures, each of which is usable to build only a single printing press. Printing presses are typically described as having an operating side and a side facing away from the operating side. In most conventional printing presses, the operating side, which is the side of the press where the press operators are situated, and where the press operating elements are located, has been a side of the press which is opposite to the side of the press where all of the drive motors are located. Thus, conventional printing presses have an operating side and a drive side.

Most printing presses are described as a left-right press or as a right-left press. This refers to the direction of web travel through the press, as viewed by the press operator who is situated on the operating side of the press. The Examiner is invited to review paragraph 0030 of the Substitute Specification in this regard.

As discussed starting at paragraph 008 of the Substitute Specification, a substantial advantage in the outlay of time and funds required for construction, for manipulation, for press installation and the like can be accomplished in accordance with the present invention. This can be done by producing the various printing press systems in a modular manner using identical

intermediate products. This is made possible by the provision of symmetrical connecting points so that lateral frames can be used as either operating side frames or as opposite wall frames. Drive motors, which in the past, were required to be placed on the side of the lateral frame opposite to the operating side, can be instead placed on the operating side. Cylinders of different widths can be substituted for each other by appropriate lateral positioning of the side frames. Also, cylinders of different diameters can be substituted for each other. This is made possible by the provision of the lateral side frames as more universal units instead of as units that are usable only as an operating side and or as a unit usable opposite to the operating side and thus referred to as a drive side lateral frame. The Examiner is invited to refer to paragraph 0035 of the Substitute Specification, as well as to other paragraphs in this regard.

As may be seen in Fig. 1 of the drawings filed with the application, a printing press can include a roll unwinder 100; a web draw-in unit 200; a plurality of printing units 300; a dryer 500; a suitable superstructure 700, where the printed webs are cut longitudinally and are assembled, and a folding apparatus 800. Such a printing press, as depicted schematically in Fig. 1, may be 100 or more feet in length and may be three stories high. In accordance with the present invention, as depicted in Fig. 5, a pair of lateral frames 352 and 353 support the various cylinders and rollers of each printing group between them. Each of the two side frames 352 and 353 is provided with prepared connection points 347, with a location for a display 390, with hollow spaces 356 and with the ability to support a main drive motor 354. Each lateral frame 352, 353 is usable as an operating side frame or as an opposite side lateral frame. Each lateral frame has various connecting points that can receive and support cylinders and rollers of different diameter and width. Thus, with many fewer variations in side frame configuration, a larger number of printing presses, than has been possible in the prior art, can be fabricated. The Examiner is requested to review the discussion at paragraph 0057 of the Substitute Specification in this connection.

During a review of the Substitute Specification, in the course of the preparation of the subject Amendment, several minor typographical errors were noted. These are being corrected in the present Amendment. The correction of these minor errors does not constitute any new matter. Their entry is respectfully requested.

In the Office Action of February 19, 2008, claims 21 and 22 were rejected under 35 USC 102(b) as being anticipated by U.S. patent No. 6,408,746 to Weschenfelder. Claim 19 was rejected under 35 USC 103(a) as being unpatentable over U.S. patent No. 6,502,508 to Schaede in view of U.S. patent No. 4,031,824 to Bubley. Claim 20 was rejected under 35 USC 103(a) as being unpatentable over Schaede in view of Bubley and further in view of U.S. patent No. 7,044,054 to Stiel. Claim 23 was rejected under 35 USC 103(a) as unpatentable over Schaede in view of Bubley and further in view of U.S. patent No. 6,848,846 to Codos. Claim 24 was rejected under 35 USC 103(a) as unpatentable over Schaede in view of Bubley and Stiel and further in view of U.S. patent No. 3,966,105 to Curran. Claims 25 and 26 were rejected under 35 USC 103(a) as being unpatentable over Schaede in view of Bubley and further in view of Weschenfelder. Claim 27 was rejected under 35 USC 103(a) as being unpatentable over Weschenfelder in view of Schaede. Claim 28 was rejected under 35 USC 103(a) as being unpatentable over Schaede in view of Bubley and further in view of U.S. patent No. 5,975,525 to Hartmann. Claims 29-33 and 35 were rejected under 35 USC 103(a) as unpatentable over Weschenfelder in view of Codos. It appears that claim 36 was also included in this rejection. Claim 34 was rejected under 35 USC 103(a) as being unpatentable over Weschenfelder in view of Codos and further in view of Hartmann.

Claim 21, as amended, recites a printing press with at least first and second web-fed rotary printing units. At least one pair of cylinders, including a forme cylinder and a transfer cylinder is in each of the printing units. These cylinders are supported by spaced lateral frames which define first and second sides of each of the first and second printing units. Each of these lateral side frames includes prepared connection points with each such prepared connection

point being adapted to receive a printing unit operating element. Each such operating element is usable for the control of functions of each of the associated printing units. Each such operating element is selectively positioned in one of the first and second lateral frames to define an operating side of the printing press.

Referring initially to Fig. 1, there may be seen a printing press with at least first and second printing units 300. In Fig. 1, there are shown five such printing units 300. Now referring to Fig. 4, each such printing unit has at least one forme cylinder 304 and at least one transfer cylinder 303. It also includes additional cylinders, such as cylinder 329 and 330, which are part of a dampening system. Turning now to Fig. 5, there is shown the same printing unit, with a plurality of its cylinders removed for ease of illustration. Note that rollers or cylinders 329 and 330 are still shown. The printing unit 300 includes lateral side frames 352 and 353. Both of these side frames have various prepared connecting points such as 397 and 398. They both also have a connecting point 390 for an operating element, as discussed in paragraph 0057. Also note the discussion at paragraph 0047. Such an operating element, as discussed in paragraph 0048 includes appropriate input or switching elements such as, for example, a touch-sensitive display. The one of the two spaced lateral frames which is provided with the operating element is the side which is defined as the operating side of the printing press. It is the side of the press located adjacent to, or more readily accessed by the press operator.

The patent to Weschenfelder is not the same as, or similar to the printing press recited in currently amended claim 21. Weschenfelder depicts a plurality of printing units 01-04 and 06-09. Each such printing unit includes a plurality of cylinders that are supported between side frames. However, the Examiner's assertion that there are side frames 73 and 74 is not correct. These frames 23 and 24 are each one lateral frame of what is a pair of lateral frames 81, 87, as seen in Fig. 5. It is quite clear that these lateral frames 81 and 87 are specifically configured to be either a first side frame or a second side frame.

In the rejection of claim 21, it is asserted in the Office Action that the side frames 23 and 24 are adapted to receive cylinders. These cylinders are supported in eccentric bushings or by three ring bearing assemblies. It is noted that the Weschenfelder reference is silent as to the provision of any prepared connection points, as recited in original claim 21 and as further recited and defined in claim 21, as amended. The mere fact that Weschenfelder shows a plurality of printing units does not mean that it anticipates the printing press of currently amended claim 21. The entire thrust of the subject invention, as recited in claim 21, is missing in the Weschenfelder reference. Weschenfelder has no discussion or suggestion of lateral frames, each of which is provided with prepared connection points, each of which can be selected to receive a printing unit operating element which is usable for the control of functions of the printing unit and whose positioning in one of the side frames defines an operating side of the printing press. Weschenfelder simply does not anticipate the subject invention, as recited in currently amended claim 21.

Claim 22 depends from claim 21 and further recites that one of the prepared connection points is included in each of the at least first and second printing units. Weschenfelder does not show, or suggest the structure recited in both of claims 21 and 22. Thus claims 21 and 22 are not anticipated by the Weschenfelder reference.

Claim 19 was rejected under 35 USC 103(a) as being unpatentable over the Schaede reference in view of the Bubley patent. Again, a comparison of claim 19, as amended, with the structure disclosed in Schaede and Bubley shows that these two references, even if they are combinable, does not render obvious the printing press recited in currently amended claim 19.

Claim 19, as filed, and as amended, is directed to a printing press, as is claim 21. Whereas claim 21 recites at least first and second printing units, claim 19 recites only at least one printing unit. That at least one printing unit includes a forme cylinder and a transfer cylinder, as do the printing units of claim 21. Claim 19 further recites a drive connection in the printing unit and which couples the forme cylinder the transfer cylinder. A drive motor is engagable with

the drive connection and is adapted to rotate the forme cylinder and the transfer cylinder. Such a drive connection and a drive motor arrangement are shown quite clearly in Fig. 5, at 354, and in much greater detail in Fig. 7.

The printing press recited in claim 19 has a first side which is an operating side and a second side that is facing away from the first side. An operating element, as that term is defined in the Substitute Specification, is supported at the first side of the printing press and that first side is thus the operating side of the printing press. Claim 19 is further amended to recite that the drive connection and the drive motor are also situated on the first, operating side of the printing press.

In the Schaede patent, No. 6,502,508 there is shown a rotary printing press that includes forme cylinders 27 and transfer cylinder 02. As seen in Fig. 3, each pair of forme cylinder 27 and transfer cylinder 02 is provided with a drive motor 19. The forme cylinder 27 can be driven by a gear drive from the transfer cylinder. To that limited extent, the Schaede reference is relevant to the subject invention, as recited in currently amended claim 19.

Schaede does not include any discussion regarding its spaced side frames 13 and 14. They appear to be identified as lateral frames 13 and 14 at Column 2, lines 63 and 64. There is no discussion of what constitutes an operating side of the printing press and what constitutes a second side opposite to the operating side. Schaede consistently shows the motors 19 or 21 adjacent the lateral frame 14. In accordance with conventional terminology, that side would thus be referred to as the drive side. The drive side is usually on the side of the machine which is away from the side of the machine closer to the press operator. Thus, in accordance with conventional parlance, the lateral frame 13 of Schaede would be the operating side. However, such labeling of sides is not described or discussed in the Schaede reference.

It is to be noted that Schaede is directed to a rotary printing press of substantial size. For example, the barrels of the forme cylinder and of the transfer cylinder are in the range of 200

mm. This means that their diameters are approximately 400 mm. Such printing units are typically used to print newspapers and the like.

The secondary reference to Bubley, U.S. patent No. 4,031,824 is not combinable with the Schaede reference in any meaningful or usable combination. Whereas Schaede is clearly directed to a printing unit of a large web-fed rotary printing press, such as would be usable to print a daily newspaper, the Bubley device is a small sheet fed press that would be used to screen print a very limited number of items. As seen in Fig. 1, the Bubley screen printing device has no forme cylinder or transfer cylinder. It does not use any type of rotary motion to convey and to print a web of material. Instead, Bubley uses a generally vertically reciprocable printing head 16 that drops vertically down onto a printing bed 18.

The Bubley patent is directed to a feed and takeoff assembly 10 that is usable to supply the blank sheets of paper to the printing head 16/printing bed 18 and to remove printed sheets from the printing head 16/printing bed 18. The feed and takeoff assembly 10 includes an elongated frame 12 which is mounted horizontally and which moves a carriage with sheet end grippers 26. These sheet end grippers 26 engage an end of a sheet to be printed and moves that sheet to the right, as seen in Fig. 1, along the first table 12 to a point where the sheet is printed by the printing head 16. A separate takeoff gripper 28 is shown in Fig. 3. It is connected to the first gripper 26 by connecting rods 30. The takeoff gripper 28 is actuated at the same time as is the first gripper and is usable to remove a piece of printed stock from the printing bed 18.

It is asserted in the Office Action, that Bubley teaches an operating side where a drive motor and a drive connection are located. There is no discussion of such features. The motor depicted at 61 in Fig. 8 is for use in moving the gripper carriage to move the sheet feeding gripper 28. That motor 61 is not analogous in any way to a drive motor that causes a cooperating pair of a forme cylinder and a transfer cylinder to rotate. Any assertion to the contrary merely highlights the Examiner's lack of familiarity with the printing press art.

There is no possible way that the Schaede and Bubley references could be combined. The Schaede reference uses rotating forme cylinders and transfer cylinder, in conjunction with a counter-pressure or impression cylinder 01, to print on a web of paper as that paper moves continuously through the printing press. Bubley shows a small scale bed and platen machine in which individual sheets of paper are moved, in a serial manner into and out of a print position between a screen printing head 16 and a printing bed 18. The only common feature of the two is that they both perform a printing operation. Other than that, there is no reason why the two could be combined. Any possible combination would have to be one in which a web of paper is printed by the Schaede device, is cut into individual sheets and those individual sheets are then printed by the Bubley device. Claim 19, as filed and even more clearly as amended, is not rendered obvious by the combination, however illogical, of Schaede and Bubley.

The third independent claim, claim 29, was rejected as being unpatentable under 35 USC 103(a) over Weschenfelder in view of U.S. patent No. 6,848,846 to Codos. That rejection is equally as untenable as the rejection of claim 19 over the combination of Schaede and Bubley.

Claim 29, as filed, and even more clearly as amended, follows the same claiming scheme as do claim 19 and 21. Claim 19 is directed to a single printing unit in a printing press. Claim 21 is directed to at least first and second printing units in a printing press. Claim 29 is directed to a printing press arrangement including at least two web-fed printing presses. Each such printing press has at least first and second printing units with at least one motor adapted to drive the printing units. More importantly, each such printing press has first and second lateral frames defining a first operating side and a second side that is facing away from the operating side.

In claim 29, as filed, and even more clearly as amended, there is recited at least one operating element provided on the lateral side of each printing press that is defining the operating side. The at least one operating element is usable for the control of functions of each

said printing press. That language is similar to the language used in currently amended claim 21.

A first one of the printing presses has at least one drive motor on the operating side, the same side as the at least one operating element. The second one of the printing presses has at least one drive motor on the second side which is opposite to the first operating side of the printing press.

The Weschenfelder reference has already been discussed in detail in connection with the rejection of claim 21. Since currently amended claim 29 uses essentially the same language as is employed in claim 21, specifically with respect to the provision and location of an operating element, it is believed that the Weschenfelder reference is no more relevant to claim 29 than it is to claim 21.

It is to be noted that Weschenfelder does not show or suggest multiple printing presses. Instead, Weschenfelder shows a plurality of printing units in a single printing press (emphasis added). The Examiner is respectfully requested to review the depiction of Figs. 9 and 10, and their association discussions to understand the difference between printing presses each having a plurality of printing units, as shown in Figs. 9 and 10; and a single printing press having a plurality of printing units as shown in Weschenfelder. The Examiner cannot manipulate the terminology to fit his desires.

The addition of the Codos reference to the Weschenfelder device does not overcome the failings of the primary Weschenfelder reference. By the Examiner's own assertion, Weschenfelder does not teach that a material supply unit is associated with each printing press. The Codos reference is cited to show such a material supply unit. However, it is not the provision of a material supply unit that differentiates the printing press installation recited in independent claim 29 from the prior art. It is the provision of at least one operating element, as that term is defined, on the operating side of each printing press. It is also the provision of a drive motor in the operating side of one of the presses and the provision of a drive motor on the

opposite side of the second printing press. These are the features of the subject invention, as recited in currently amended claim 29 which are believed to patentably differentiate the claim over the prior art.

All of the dependent claims that depend from their respective one of independent claims 19, 21 and 29 are also believed to be allowable because of their dependencies. None of the cited secondary references that are cited to show the particular features of these dependent claims are believed to show the features of the several independent claims. Thus, all of the dependent claims are also believed to be allowable.

The Masuch reference, as cited by the Examiner in the Office Action of February 19, 2008, was not relied on in the rejections of the claims. No discussion thereof is believed to be required.

SUMMARY

The Substitute Specification has been amended to correct several minor typographical errors. These do not constitute any new matter. Their entry is respectfully requested.

Independent claims 19, 21 and 29 have all been amended to more clearly patentably define the subject invention over the prior art of record. It is believed that these independent claims, as well as their dependent claims, are patentable over the prior art cited and relied on in their rejections, taken either singly or in combination. Allowance of the claims and passage of the application to issue is respectfully requested.

Respectfully submitted,

Andreas Ewald Heinrich BERNARD
Manfred Hermann LIEBLER
Applicants

JONES, TULLAR & COOPER, P.C.
Attorneys for Applicant



Douglas R. Hanscom
Reg. No. 26,600

May 19, 2008
JONES, TULLAR & COOPER, P.C.
P.O. Box 2266 Eads Station
Arlington, Virginia 22202
(703) 415-1500
Attorney Docket: W1.2306 PCT-US